Donnelly, Jack W

From: Smith, Douglas C (Chris)
Sent: Wednesday, March 05, 2003 11:28 AM
To: Donnelly, Jack W
Subject: FW: Comments-ESD to NR-1 & NR-2 TSD Interim Action ROD

more good comments....

-----Original Message-----
From: GRogers522@aol.com [mailto:GRogers522@aol.com]
Sent: Wednesday, March 05, 2003 10:30 AM
To: douglas_c_chris_smith@rl.gov
Cc: GRogers522@aol.com
Subject: Comments-ESD to NR-1 & NR-2 TSD Interim Action ROD

I strongly support the proposed ESD for the subject action. The proposed action to prohibit irrigation is correct in light of both the Comprehensive Land Use Plan for the subject waste site as well as the executive order establishing the Hanford Reach National Monument. Both these decisions effectively prohibit both residential use and irrigated agricultural use at the subject waste site. The proposed modifications to the Institutional Control Plan assure that irrigation is not used on subject site. The very large cost of deeper excavation is clearly not justified.

I request a copy of the Response to Comment document for this issue when issued.

Gordon J. Rogers
1108 N. Road 36
Pasco, WA 99301

Donnelly, Jack W

From: Smith, Douglas C (Chris)
Sent: Monday, March 03, 2003 7:38 AM
To: Donnelly, Jack W
Subject: FW: Changes to Cleanup Comments

get comfortable, this is a long message.

-----Original Message-----
From: Bogeyandbobby@aol.com [mailto:Bogeyandbobby@aol.com]
Sent: Friday, February 28, 2003 7:20 AM
To: douglas_c_smith@rl.gov
Cc: Bogeyandbobby@aol.com
Subject: Changes to Cleanup Comments

Chris Smith,
Sorry for the overall lengthy nature of my comments, but I have been very interested in the total Hanford Cleanup for the last 15 years or so!

In response to the DOE/ROO request for Public Comment on "Changes to Cleanup Decisions on the Columbia River Corridor", my enthusiasm for this approach is apparent from my comments as below. The Tri Party Agencies have taken a big step toward a more realistic cleanup approach (i.e. level of risk vs: extent of effort).
The proposed "significant change to the scope, schedule or cost of cleanup" appears to be a genuine effort to revisit applicable Regulatory Requirements now specified in the Tri Party Agreement. For now, this only applies to the extent of cleaning up the 100-N Area land, and with the added proposal that all future irrigation of that land be prohibited. It follows that any other reactor/processing site cleanup efforts that pose an "extensive effort with no additional protection to the Groundwater or the Columbia River" (or Public or Environment) would also justify revisiting appropriate Regulatory Requirements. Any other extensive cleanup efforts with no additional protection to the Columbia River, Public or Environment, would also justify the same consideration.
In the past, I have often proposed that DOE, Hanford Contractors, Wash. State Ecology, Tribes and Stakeholders revisit the Nuclear Regulatory Requirements for Environmental Cleanup as applicable to the Hanford Site. The purpose being to finalize cleanup of Hanford Land, not to "Original Condition" (for unlimited Public use) as stated in the Tri Party Agreement, but to perform the Cleanup to extent there is no realistic risk to our water, the public and the environment. The remaining "No Risk Contamination" would be disposed of in-place and isolated from the Public as fenced-in sites. All Fenced Cleanup Sites would be included as Monuments in a proposed "Hanford Nuclear National Park", which would also include the Hanford Reach Monument, B Reactor Museum, CREHST, and FFTF (either operational or cleaned up). The remaining part of Hanford land would be available for Public uses either irrigated or not as determined by Tri Party Agencies. This approach would optimize the Vitrification Plant facility scope and processing effort to only that for readily retrievable, high risk waste. Overall, this would result in very significant savings in Time, Risk and Cost to the United States Government! This savings would be realized many times based our large number of national cleanup sites.
It seems we will bankrupt our country in trying to cleanup Hanford, then repeat the process at all other national and commercial reactor cleanup sites in the same costly manner! All stakeholders should be most interested in spending otherwise wasted cleanup funds on important national issues regarding our citizens needs. As Cleanup progresses, it is obvious that removing all waste from tanks, basins, burial grounds and structures is no longer feasible. We must review the in-storage waste forms as they now exist, then be sure the Tri Party Agreement and Nuclear Regulatory Requirements still apply for safe storage and removal. Also:
1. How realistic are the risks to the environment, river corridor and the public
in its present state?

2. How difficult is removal of all non-pumpable waste from each tank with
the existing physical and radiological properties?
3. How feasible to leave waste in-situ in some existing storage/disposal sites?
4. What words of the TPA and/or Regulatory Reqmts need to be re-interpreted
or changed to ensure low risk, timely and cost effective cleanup?

My views on overall Hanford Site Preservation cover the environmentally safe cleanup, historical preservation and future utilization of land and facilities. That proposed approach is to ensure cost effective efforts on FFTF, Hanford Cleanup and Hanford Museums/National Parks. My general comments above are based on the following information - hopefully to be read and taken into consideration for this current "Changes" effort. This proposed Hanford Nuclear National Park approach applies to the Overall Hanford Cleanup and "Long Term Stewardship Program".

D. MEYERS' COMMENTS ON LONG TERM STEWARDSHIP PROGRAM

Great title for effort to ensure Hanford's facilities are demolished, secured and further utilized while preserving the overall Atomic History of Hanford! This being accomplished without endangering our water, the public and the environment, while fully utilizing existing facilities to benefit the Tri City Area, Washington State, and our National Government. My comments on the 3 points of Approach for Long Term Stewardship are addressed as follows:

1. Management of Leftover Contamination

A. Concentrate cleanup effort and funding completely on the River Protection Part of Hanford Cleanup. Do it RIGHT NOW! -- at considerably lower total cost, elapsed time, and risk to the Public and Environment. Could probably complete for only $5 to 10 BILLION and in 5 to 10 YEARS!! --- Let development of the Vitrification Plant be a parallel effort -- Vit Plant problems must not delay the River Protection part of Hanford Cleanup!!

B. Ensure all Radioactive Waste is DRIED UP

1. Forget about total clean out of tank waste -- remove liquid and
leave solids.
2. Stir tank liquid/sludge waste into slurry in a safe manner using
proven, standard, existing equipment/procedures
3. Pump tank slurry to Evaporator and process, dry out
remaining sludge/mud and leave in tank
4. Stir, transfer and process basin liquid/sludge, in proven manner
similar to tank waste in (2) above
5. Dryout basin sludge/mud/trash items and leave in basin -- cover
to confine contamination
6. Remove liquid waste from cribs/other holding areas in manner
similar to tanks/basins.
7. Dispose of Hanford Site contaminated structural and equipment
items by placing in dried-out waste tanks, basins and old process
buildings (canyons, reactors), while filling voids with contaminated soil, etc.

C. Remove High Level Radioactive PU/TRU waste (e.g. fissile and irradiated component) from old process buildings and basins, and transfer into surface fuel storage/disposal using safe, reliable and proven transfer/handling methods. For insignificant amounts of High Level PU/TRU, dry out and leave/dispose of in-place within secured/covered facilities.

D. Keep Low Level Radioactive PU/TRU in existing containers and storage in Hanford facilities until transfer to Permanent Nevada Disposal Facilities.

E. Leave Low Risk Radioactive/Hazardous waste in storage and disposal structures intact to maximum extent possible, and fill structures with other dry waste like contaminated soil, equipment and materials. Seal/cover the filled structures and facilities for permanent in-place disposal of these waste.

F. Permanently cover/enclose the filled tanks, basins and buildings so rainwater can't contact contamination and leach to the groundwater or the Columbia River.

2. Protection of the Hanford Site's Cultural, Biological and Natural Resources

A. Cleanup Monuments

1. Install security fences around permanent cleaned-up waste Areas and building sites to isolate from Public.
2. Declare each fenced-in site a FEDERAL MONUMENT (like B-Reactor Museum).
3. Each fenced site would have Tourist actuated audio stations providing description and history of that particular site -- all sites combined would help tell the Hanford Production Story!
4. The cleaned-up Hanford Site would contain clean public roads and mostly usable lands, with Cleanup Monuments fenced in.
5. The cleaned-up site Custodian would ensure that in future, if any existing radioactive contamination gets into the groundwater and Columbia River, that it proceeds only at diminishing and acceptable rates.

B. B Reactor Museum

This Museum has already proved itself invaluable for tourist understanding about the Hanford Production Reactor's operation. Historical remains are preserved to display various aspects of the reactor's operation and production of the Plutonium. Excellent verbal descriptions are provided on walk-thru tours.

C. Hanford Reach National Monument

This unique part of the Hanford Site has preserved the original condition of the Hanford town, Columbia River and surrounding areas. It is apparent there are little adverse affects on the vegetation and wildlife activity on this reservation-type area.

D. CREHST (Columbia River Exhibition of History, Science & Technology)

This special museum houses the overall history of the Hanford Atomic activities, with remnants, photos, stories and documented articles to show, display and tell the detailed history of personnel, facilities and way of life at Hanford.

E. FFTF (Fast Flux Test Facility)

The FFTF Project was successful from the first proposals thru design, research & development, construction, plant acceptance testing and initial operation. This facility has been self sustaining as evidenced by its good operating record over the past 20 years of operation. That was possible by performing its own remote maintenance on radioactive equipment utilizing the remote capability of the Interim Examination & Maintenance Cell.

The "fast reactor" (fast neutrons greatly shorten irradiation time) lets materials be irradiated faster to predict long term radiation affects for future materials and energy development. In the same fast reactor environment, FFTF can quickly produce radio-isotopes which are required for medical applications including early detection, treatment and cure of cancer patients. The FFTF has already provided materials research to expedite improvement of reactor plants around the world. The "new generation" of nuclear reactors being considered will require the advanced testing capability of the FFTF.

3. Reuse of the Hanford Site's Assets

It is apparent that combining the B Reactor Museum, CREHST, and Hanford Reach National Monument efforts, with the upcoming "Hanford Cleanup Monuments" into one overall Hanford Nuclear National Park could result in great savings. Presently our Hanford Site Projects continue to compete for DOE funding and priority which results in increased time, cost and risk.

The total Cleaned-Up Hanford Site would consist of the Cleanup Monuments, with clean roads and lands accessible to the Public. The Cleanup Monuments, B Reactor Museum, CREHST, the Hanford Reach and the FFTF could combine to make up the Hanford Nuclear National Park with all historical aspects preserved. That history would span from initial Hanford construction days to present energy and medical research capability provided

by the FFTF Fast Breeder Research Facility. Tourists could visit all these Monuments and Museums to view and hear the overall Hanford Atomic History.

It was bad enough to lose our Hanford Nuclear Power Park when the successful Fast Breeder Reactor Program was terminated in the 1980's. That started with cancellation of the Clinch River Breeder Reactor Plant, then the planned Full Scale Demonstration plants in New England states and our four Fast Breeder Power Production Plants here at Hanford. We could have furnished electrical power to whole Pacific Northwest - possibly even the West Coast! For just bringing Enriched Uranium into the Nuclear Power Park, recycling the spent fast breeder fuel, and processing the radioactive waste (all within the Power Park site!) and sending clean electrical power out of the Park. A series of about 5 or 6 Nuclear Parks across the U.S. could have provided most of our national electrical energy needs - without depending on foreign supplies!

Let's not lose this chance for an Economical Hanford Cleanup and National Monument to preserve the atomic age history at Hanford for our Nation. Nuclear Energy is good - we just need to deal realistically with processing the radioactive waste products. We can take pride in displaying such a successful and high quality facility as the FFTF, and still use it as an important medical, materials, and energy research tool!

Donnelly, Jack W

From: Smith, Douglas C (Chris)
Sent: Tuesday, April 01, 2003 8:11 AM
To: Donnelly, Jack W; Thompson, K M (Mike)
Subject: FW: CRK Comments 100 N-Area

116-N CRK Comments

enjoy

-----Original Message-----
From: Gregory deBruler [mailto:cruwa@gorge.net]
Sent: Monday, March 31, 2003 3:54 PM
To: douglas_c_chris_smith@rl.gov
Cc: Dennis Faulk; Tom.Stoops@state.or.us; jpri461@ecy.wa.gov
Subject: CRK Comments 100 N-Area

3/28/03

Mr. Chris Smith
USDOE-RL
P.O. Box 550 (A3-04)
Richland, WA 99352

Re: CRK Comments on "Explanation of Significant Difference to the 100 NR-1 Operable Unit Treatment, Storage and Disposal Interim Action Record of Decision and the 100-NR-1/100-NR-2 Operable Unit Interim Action Record of Decision"

Dear Mr. Smith:

Columbia Riverkeeper whishes to thank you for the opportunity to comment and for extending the comment period allowing for more public involvement. It was unfortunate that USDOE decided the day of the Portland meeting not to attend the Columbia Riverkeeper Groundwater Soil Focus group meetings in Portland and Hood River. This would have allowed the Department of Energy to receive more comments directly from the public and CRK invested significant time and energy to make this opportunity known to the public.

Columbia Riverkeeper has had the opportunity to review the proposed changes for the specific 116-N trench, and at this time offer the following comments on behalf of our more than 2500 members and supporters:

1.) The record needs to be corrected, this is not *"a proposed change to an existing Record of Decision."* Please let the record state that this is, **a proposed change to an Interim Record of Decision.**
2.) It is unacceptable to remove the 30" irrigation scenario. USDOE cannot assure that that irrigation will not occur within the next 300 years or even the next 50 years, or that significant climatic changes will not occur. Considering the growth that will occur over the next 50 to 100 years, agriculture land will be in even greater demand. Institutional controls have a history of failing in the very short-term. Based on these considerations, USDOE must not remove the 30" irrigation scenario.
3.) USDOE should not move to an already defacto cleanup and assume that institutional controls is the only path forward. USDOE is obligated under the TPA, state and federal law to cleanup the source term to be protective of groundwater, and to cleanup the groundwater to its highest beneficial use, which in most cases is the drinking waster standard.
4.) USDOE should not at this time attempt to move to a final Record of Decision before a comprehensive ecological risk assessment has been performed and all other legal requirements are

met. There is no scientific basis for the statement in the ESD that "this will be protective of human health and the environment".
5.) USDOE should not state this is "cost effective," when USDOE has not assessed what costs will be incurred from the loss of the cultural and natural resources under the Natural Resources Damage Assessment Act (NRDA).
6.) Before any final decision is attempted, USDOE must perform a full Remedial Investigation and Feasibility Study of the entire N-Area. Columbia Riverkeeper hopes that this process will be an open process that involves the public and tribes in open dialogue around this very important cleanup process.
7.) To date, USDOE has not met the Monitored Natural Attenuation requirements under CERCLA for this area, these must be met before any decision is made.
8.) USDOE has failed to assess the effect of the sodium plume in the N-Area when it migrates into the strontium-90 plume. This assessment must occur before any final decisions are made.
9.) The flood scenario has been ignored by all assessments to date. One of the requirements under CRCIA is to assess flooding from a catastrophic flood. One can not assume that the dams will be intact in 100 years, let alone 200 years or longer.
10.) The current alternative strategies are myopic in focus and more work needs to be done in identifying and implementing other technologies, in order to remediate the source term, groundwater and for the long-term protection of groundwater. Monitored Natural Attenuation is not acceptable.
11.) The RCRA performance standards of WAC 173-303-610 (2) have not been met and must be met before this decision is made.
12.) This ESD has failed to identify how much contamination remains and therefore RCRA closure decisions should not be made until such characterization data is acquired.
13.) This ESD does not acknowledge that RCRA groundwater monitoring requirements have not been met. No action should be taken until such requirements have been satisfied.
14.) This ESD does not state how Washington States water quality standards will be met, specifically WAC 173-200, which applies to all groundwaters. These standards do apply and must be met.

Columbia Riverkeeper hopes you find these comments useful and looks forward to working with you in the future and involving more of the public in these important Hanford decisions.

Sincerely,
Greg deBruler
Columbia Riverkeeper Hanford Analyst